

John H. Gomez (SBN 171485)
Allison C. Worden (SBN 211104)
Ed Diab (SBN 262319)
Kristen K. Barton (SBN 303228)
GOMEZ TRIAL ATTORNEYS
655 West Broadway, #1700
San Diego, CA 92101
T: (619) 237-3490
F: (619) 237-3496

James R. Patterson (SBN 211102)
Allison H. Goddard (SBN 211095)
PATTERSON LAW GROUP
1350 Columbia St., Unit 603
San Diego, CA 92101
T: (619) 756-6990
F: (619) 756-6991

Duane A. Admire (SBN 173699)
ADMIRE & ASSOCIATES
12880 Carmel Country Road, Suite D110
San Diego, CA 92130
T: (619) 319-6658
F: (858) 350-1046

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

JESSICA LINCOLN; SUZAN AHMED;
CINDY BALDERRAMA; ALINA BAZAR;
DOMAN BEDUHI; JALANA BERNARD;
NORY BETANCOURT; PONDER BISHOP;
EILEEN BRANDT ; KIMBERLY COOK;
KARLA CLEMENT; ASHLEY CREATON;
MALISA CRON; KRISTINE DAVIS;
MARISSA DAVIS; JENNIFER ELLIS;
KRISTIN ETHERIDGE; JOSELINE OSUNA;
YESENIA FELIX; AMANDA FLORES;
KAREN FORRESTER; MARGARET
GARCIADREALBA; CHERISH GARCIA;
TAYLOR GORMAN; CHERYL HARDER;
MARIA FERNANDA HERNANDEZ-MORA;
SARAH HOLLIS; KRISTEN HOLTZ; ANN
JACKSON; TRENA JACKSON; NICOLE
KAMINSKY; STACHIA KEMP; SHADIA
KHOURI; DEBBIE KNIGHT; APRIL
LOCKHART; PAOLA LOPEZ; JAMIE
LOWE; MARICELA MARTINEZ; ALICIA
MELLO; NICOLE MORRIS; SHANEESHA
MOSELY-ROGERS; JAMIE MOSS;
MICHELLE MOWREY; SHELLEY
NEWMAN; SHANNON NUZZO; MARTHA
OLMOS; VIAN ORAHA; KIMBERLEY
ORSER; DANA PEDERSEN; YARITZA

CASE NO: 37-2019-00016922-CU-MT-CTL

COMPLAINT FOR DAMAGES FOR:

- 1) **BREACH OF FIDUCIARY DUTY**
- 2) **INVASION OF PRIVACY –**
INTRUSION INTO PRIVATE
AFFAIRS
- 3) **INVASION OF PRIVACY (Cal.**
Const., Art. 1, § 1)
- 4) **NEGLIGENCE**
- 5) **NEGLIGENT INFLICTION OF**
EMOTIONAL DISTRESS
- 6) **UNLAWFUL RECORDING OF**
CONFIDENTIAL
INFORMATION (Pen. Code
§ 632, 637.2)

DEMAND FOR JURY TRIAL

1 PEREZ; LESLIE PERKINS; SAMANTHA)
2 PLEIN; GAETANA PRINCIPATO; JAIME)
3 PUZZ; AMANDA RENFROW; MICHELLE)
4 RODRIGUEZ; STEPHANIE RODRIGUEZ;)
5 VALERIE ROSITAS; KATRINA ROTHERT;)
6 HEATHER ROTHWELL; DANA RUTHERIG;)
7 SARAH SALIE; JESSICA SANCHEZ; LISA)
8 SANDERS; DEVON SANTOS; STEPHANIE)
9 SARRA; AMY SCARBOROUGH; ANGELA)
10 SEVERINO; RACHEL SHADDIX; DANDI)
11 SIMMONS; LOURDES SOLIS; KATREEN)
12 STEPHAN; BARBARA SWISHER; REGINA)
13 TEX; SONIA VALENCIA; SPRING VICK;)
14 COLLEEN WALSH; KIMBERLY WEAVER;)
15 NANCY WEDIN; MICHELLE WINKLER;)
16 KENDRA WOOD)

17 Plaintiffs,

18 vs.

19 SHARP HEALTHCARE., a California)
20 Corporation; SHARP GROSSMONT)
21 HOSPITAL, and DOES 1-100 INCLUSIVE,)
22 Defendants.)
23)
24)
25)
26)
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28)

Plaintiffs, by and through the undersigned counsel, hereby bring this Complaint for damages against Defendants, and allege the following:

INTRODUCTION

1. From approximately July 17, 2012 to June 30, 2013, Defendants secretly operated hidden cameras in all three Labor and Delivery operating rooms at the Women's Center at Sharp Grossmont Hospital. The hidden cameras were programmed to record anytime motion was detected in the operating rooms. The hidden cameras recorded video images of births, including Caesarean births, birth complications, dilatation and curettage to resolve miscarriages, hysterectomies, sterilizations, and other medical procedures.

2. Sharp secretly recorded approximately 1,800 patients using these hidden cameras. In the words of a Sharp executive, "the video clips capture scenes within the three operating rooms, which

1 are not open to the public. There are images contained within the multitude of images of women
2 undergoing operations of a very personal, private nature, unconscious and in states of exposure
3 depending on the operating being performed.”

4 3. Sharp was grossly negligent in maintaining the recordings. The recordings were stored
5 on desktop computers that could be accessed by multiple users, some without the need for a password.
6 Sharp did not log or track who accessed the recordings, why, or when. Sharp destroyed at least half of
7 the recordings but cannot say when or how it deleted those files and cannot confirm that it took the
8 appropriate steps to ensure the files were not otherwise recoverable. Computers that stored the
9 recordings were “refreshed” or replaced, and Sharp did not ensure proper deletion of recordings on
10 those computers.

11 4. Sharp has acknowledged patients’ rights to privacy in the recordings, under the
12 California Constitution and California law. Sharp violated their right to privacy and breached its
13 fiduciary duty in the most egregious way by secretly recording them, allowing non-medical personnel
14 to view the recordings without making any effort to track who was viewing them, and then destroying
15 some of the recordings.

16 **JURISDICTION AND VENUE**

17 5. The Superior Court of California for the County of San Diego has jurisdiction over this
18 matter because the allegations and claims herein arise under California common and statutory law.

19 6. Venue is proper in this Court pursuant to Code of Civil Procedure § 395(a). Defendant
20 is a corporation organized under the laws of California and maintains its principal place of business in
21 San Diego, California. Defendant regularly conducts business throughout California, including San
22 Diego County, and a substantial portion of the harm caused by Defendant to Plaintiffs took place in
23 San Diego County.

24 **PARTIES**

25 7. Plaintiffs are women who had procedures including, but not limited to, delivery of
26 babies, including Caesarean births, birth complications, dilatation and curettage to resolve
27 miscarriages, hysterectomies, sterilizations, and other medical procedures during the time frame of
28 July 17, 2012 to June 30, 2013. Plaintiffs’ procedures occurred in one of three Labor and Delivery

operating rooms at the Women's Center at Sharp Grossmont Hospital that contained hidden cameras placed there by the Defendants as set forth in greater detail herein.

8. Plaintiffs are informed and believe, and thereon allege, that they were secretly recorded by the aforementioned hidden cameras at Sharp Grossmont Hospital. Plaintiffs had reasonable expectations of privacy during their respective procedures and a reasonable expectation that Defendants would respect their privacy. None of the Plaintiffs consented at any time to Defendants' recording of their private moments and medical procedures, and would not have consented to any such recording.

9. Defendant Sharp HealthCare is a corporation organized under the laws of California and maintains its principal place of business at 8695 Spectrum Center Boulevard, San Diego, CA 92123.

10. Defendant Sharp Grossmont Hospital is an affiliate of Sharp HealthCare that maintains its principal place of business at 5555 Grossmont Center Drive, La Mesa, CA 91942.

11. Plaintiffs are unaware of the true names or capacities of the Defendants sued herein under the fictitious names DOES 1-100 but pray for leave to amend and serve such fictitiously named Defendants once their names and capacities become known.

12. Plaintiffs are informed and believe, and based thereon allege, that each and all of the acts and omissions alleged herein were performed by, or are attributable to, Defendants and DOES 1-100 (collectively "Defendants"), each acting as the agent for the other, with legal authority to act on the other's behalf. The acts of any and all Defendants were in accordance with and represent the official policies of Defendant Sharp HealthCare.

13. Plaintiffs are informed and believe, and based thereon allege that, at all times herein mentioned, Defendants, and each of them, ratified each and every act or omission alleged herein. At all times herein mentioned, Defendants, and each of them, aided and abetted the acts and omissions of each and all the other Defendants in proximately causing the damages herein alleged.

14. Plaintiffs are informed and believe, and based thereon allege, that each of said Defendants is in some manner intentionally, negligently, or otherwise responsible for the acts, omissions, occurrences, and transactions alleged herein.

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FACTUAL ALLEGATIONS

15. In July 2012, Defendants installed video cameras on the drug carts in the operating rooms in the Women's Center at Sharp Grossmont Hospital. The video cameras were installed on top of the drug carts and equipped with motion-detecting sensors that triggered them to begin recording whenever anyone entered the room and continue recording even after motion stopped.

16. Defendants claim that this secret video surveillance was necessary as part of their investigation into whether an employee was stealing the anesthesia drug propofol from drug carts in the operating rooms. Despite that claim, Defendants' cameras were set up to record when any person entered an operating room, to record a wide range of activity in the operating room beyond access to the drug cart, and to continue recording even after motion stopped.

17. Defendants recorded approximately 1,800 surgical procedures in the operating rooms between July 2012 and June 2013. These recordings show images of Defendants' female patients while they were in the operating rooms. The cameras captured images of patients entering the operating rooms, being moved onto surgery tables and exiting. Because of the angle and placement of the cameras, patients' faces were recorded, and the patients were identifiable. These recordings also show Defendants' female patients conscious and unconscious, partially robed on operating room tables, undergoing medical procedures and communicating with their doctors and medical personnel. Because of the nature of these procedures, the recordings captured women while they were emotionally and physically exposed, and at their most vulnerable. At times, Defendants' patients had their most sensitive genital areas visible.

18. These recordings contain matters of great sensitivity, going to the core of patients' privacy rights. Defendants recorded using hidden cameras in an area of Sharp Grossmont Hospital that is not open to the public. Entry into the operating room is limited to Defendants' employees and doctors who need to be there to perform medical procedures.

19. These recordings contain images of female patients and, sometimes, newly delivered babies with their doctors that Defendants allowed non-medical personnel and strangers to view and have access to view. Defendants did not log or track which employees accessed the recordings.

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1 20. The patients did not consent to being recorded by Defendants during their medical
2 procedures. Defendants have several policies that recognize and obligate them to respect the privacy
3 of their patients. Defendants' violations of their own policies underscore the shocking and serious
4 nature of their breach of patients' privacy. Defendants' Code of Conduct contains a "Standard of
5 Behavior" for confidentiality that states that "Sharp HealthCare protects customers' confidentiality,
6 privacy and modesty in all situations. We are sensitive to the personal nature of health care, and we do
7 everything we can to earn the trust that others place in us."

8 21. According to Defendants' list of "Patient Rights," their patients have a right to "[f]ull
9 consideration of privacy concerning their medical care program. Case discussion, examination, and
10 treatment are confidential and should be conducted discreetly. [Patients] have to right to be advised as
11 to the reason for the presence of any individual."

12 22. According to Defendants' list of "Patient Rights," their patients have a right to "[h]ave
13 [their] personal privacy respected."

14 23. According to Defendants' list of "Patient Rights," their patients have a right to
15 "[c]onfidential treatment of all communications and records pertaining to [their] care and stay in the
16 hospital." Defendants promise their patients that "[w]ritten permission shall be obtained before
17 medical records are made available to anyone not directly concerned with your care."

18 24. Defendants violated these rights by failing to disclose to their patients, including
19 Plaintiffs, that a hidden camera was installed in the operating room recording their procedures,
20 essentially inviting an unlimited number of individuals to view the private circumstances of patients'
21 medical treatment. Defendants violated these rights further by allowing non-medical personnel,
22 including security guards and attorneys, to view the recordings, without making any effort to log or
23 track who viewed the recordings.

24 25. This action seeks damages for the Plaintiffs according to their individual proof, and not
25 as part of a class action, for any and all harm they suffered as a result of being secretly and
26 surreptitiously videotaped as set forth herein.

27 26. Plaintiffs further allege that the limitations period is tolled under principles of
28 equitable tolling.

FIRST CAUSE OF ACTION
BREACH OF FIDUCIARY DUTY
(Against All Defendants)

27. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

28. Defendants owed Plaintiffs a fiduciary duty to act with the utmost good faith in the best interests of Plaintiffs, and to act with reasonable care.

29. Defendants further owed a fiduciary duty to maintain inviolate the confidential information of Plaintiffs, including, but not limited to, confidential communications under California Evidence Code section 992.

30. Defendants had information relating to Plaintiffs that they knew or should have known was confidential.

31. Defendants used Plaintiffs' confidential information for their own benefit in conducting an internal investigation or communicated their confidential information to third parties, all in violation of California Evidence Code section 994.

32. Plaintiffs were ignorant of Defendants' conduct, did not authorize their conduct, did not give informed consent, or were acting under duress.

33. Plaintiffs' confidential information was not a matter of general knowledge.

34. Plaintiffs placed trust and confidence in Defendants.

35. Defendants were Plaintiffs' the healthcare providers.

36. Plaintiffs suffered harm, including but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

37. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

38. Defendants' conduct as alleged above was despicable; it was conduct so vile, base, or contemptible that it would be looked down on and despised by reasonable people.

39. Defendants engaged in the conduct alleged above with malice, oppression, or fraud in that Defendants' conduct was done with a willful and knowing disregard of Plaintiffs' rights,

Defendants' conduct subjected Plaintiffs to cruel and unjust hardship in knowing disregard of their rights, or Defendants intentionally concealed a material fact (the secret recording devices) and did so intending to harm Plaintiffs or in reckless disregard that such harm would result.

40. As a result, in addition to other remedies available, Plaintiffs may also recover damages to punish Defendants and deter future similar wrongful conduct.

SECOND CAUSE OF ACTION

INVASION OF PRIVACY – INTRUSION INTO PRIVATE AFFAIRS

(Against All Defendants)

41. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

42. Plaintiffs had a reasonable expectation of privacy in the operating rooms of Sharp Grossmont Hospital's Women Center.

43. Plaintiffs also had a reasonable expectation of privacy that their communications with medical personnel and their medical procedures were not being video recorded.

44. Plaintiffs further had a reasonable expectation that their communications with medical personnel and their medical procedures were not being recorded by Sharp security personnel or by anyone not physically present in the operating room at the time of said communications and procedures.

45. Defendants intentionally intruded on Plaintiffs' privacy by installing recording devices in the operating rooms.

46. Defendants also intentionally intruded on Plaintiffs' privacy by recording Plaintiffs' confidential communications and medical procedures in the operating rooms of Sharp Grossmont Hospital's Women's Center.

47. Defendants additionally intentionally intruded on Plaintiffs' privacy by allowing third parties, including Defendants' security personnel and attorneys, to view the recordings of Plaintiffs.

48. Defendants further intentionally intruded on Plaintiffs' privacy by disclosing certain recordings of Plaintiffs to third parties during the course of an internal investigation.

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49. In acting as alleged above, Defendants' violated Plaintiffs' privacy rights at a time when Plaintiffs were at their most vulnerable.

50. In acting as alleged above, Defendants' conduct was outrageous and motivated by a commercial interest in disregard of Plaintiffs' privacy rights.

51. Defendants' intrusion into Plaintiffs' privacy would be highly offensive to a reasonable person.

52. Plaintiffs suffered harm, including, but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

53. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

THIRD CAUSE OF ACTION

INVASION OF PRIVACY – CALIFORNIA CONST., ART. 1, § 1

(Against All Defendants)

54. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

55. Plaintiffs had a reasonable expectation of privacy in the operating rooms of Sharp Grossmont Hospital's Women's Center.

56. Plaintiffs also had a reasonable expectation of privacy that their communications with medical personnel and their medical procedures were not being video recorded.

57. Plaintiffs further had a reasonable expectation that their communications with medical personnel and their medical procedures were not being viewed or heard by Sharp security personnel or by anyone not physically present in the operating room at the time of said conversations, communications and procedures.

58. Defendants intentionally intruded on Plaintiffs' privacy by installing recording devices in the operating rooms.

59. Defendants also intentionally intruded on Plaintiffs' privacy by recording Plaintiffs' confidential communications and medical procedures in the operating rooms of Sharp Grossmont Hospital's Women's Center.

60. Defendants additionally intentionally intruded on Plaintiffs' privacy by allowing Defendants' security personnel to view the recordings of Plaintiffs.

61. Defendants further intentionally intruded on Plaintiffs' privacy by disclosing certain recordings of Plaintiffs to third parties during the course of an internal investigation.

62. In acting as alleged above, Defendants' violated Plaintiffs' privacy rights under Article I, section 1 of the California Constitution.

63. In acting as alleged above, Defendants' conduct was outrageous and motivated by a commercial interest in disregard of Plaintiffs' privacy rights.

64. Defendants' intrusion into Plaintiffs' privacy would be highly offensive to a reasonable person.

65. Plaintiffs suffered harm, including, but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

66. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

FOURTH CAUSE OF ACTION

NEGLIGENCE

(Against All Defendants)

67. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

68. Defendants negligently intruded on Plaintiffs' privacy by installing recording devices in the operating rooms.

69. At all times relevant and material hereto, Defendants had a duty to exercise reasonable care in the protection of Plaintiffs' privacy in the operating rooms, where plaintiffs were at their most vulnerable.

70. Defendants breached their duty and were negligent in their actions, misrepresentations, and omissions in numerous ways including the following:

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- a. Installing hidden cameras in the operating rooms at Sharp Grossmont Hospital Women's Center in a manner that captured more than just the anesthesiology carts on which they were installed;
- b. Failing to inform patients that the room they were in was being recorded;
- c. Failing to inform patients that their medical procedures, and communications with their doctors and hospital staff would be recorded;
- d. Failing to obtain consent from Plaintiffs to record Plaintiffs while they were in the operating rooms, their procedures, and their conversations with medical staff while in the operating rooms;
- e. Failing to log or track who accessed the recordings;
- f. Failing to use reasonable methods to ensure that any recordings that were deleted were not recoverable;

71. Defendants recorded Plaintiffs while in the operating rooms, undressing, undergoing medical procedures, and at a time when Plaintiffs were at their most vulnerable, despite the fact that the Defendants knew or should have known that the unconsented recordings were a violation of Plaintiffs' reasonable expectation of privacy.

72. As a direct and proximate consequence of Defendants' negligence, willful, wanton, and/or intentional acts, omissions, misrepresentations and/or otherwise culpable acts described herein, Plaintiffs sustained the injuries, damages, and harm as alleged herein.

73. Defendants' negligence was a substantial factor in causing Plaintiffs harm.

FIFTH CAUSE OF ACTION

NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

(Against All Defendants)

74. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

75. At all times relevant and material hereto, Defendants has a duty to exercise reasonable care in the protection of Plaintiffs' reasonable expectation of privacy in the operating rooms of the Sharp Grossmont Hospital Women's Center.

76. Defendants negligently intruded on Plaintiffs' reasonable expectation of privacy by installing recording devices in the operating rooms at Sharp Grossmont Hospital Women's' Center.

77. Defendants also negligently intruded on Plaintiffs' privacy by recording Plaintiffs' confidential communications and medical procedures in the operating rooms of Sharp Grossmont Hospital's Women's Center.

78. Defendants additionally negligently intruded on Plaintiffs' privacy by allowing Defendants' security personnel to view the recordings of Plaintiffs.

79. Defendants further negligently intruded on Plaintiffs' privacy by disclosing certain recordings of Plaintiffs to third parties during the course of an internal investigation.

80. Plaintiffs suffered serious emotional distress, including, but not limited to, suffering, anguish, fright, horror, nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt feelings, disappointment, depression and feelings of powerlessness.

81. The emotional distress suffered by Plaintiffs is such that an ordinary, reasonable person would be unable to cope with it.

82. Defendants' conduct was a substantial factor in causing Plaintiffs' harm.

SIXTH CAUSE OF ACTION

UNLAWFUL RECORDING OF CONFIDENTIAL INFORMATION (Pen. Code §§ 632, 637.3)

(Against All Defendants)

83. Plaintiffs incorporate by reference and re-allege as if fully stated herein the allegations set out in the preceding paragraphs.

84. Defendants intentionally video recorded and/or eavesdropped on Plaintiffs' confidential communications and medical procedures in the operating rooms of Sharp Grossmont Hospital's Women Center by using an electronic device (hidden video cameras).

85. Plaintiffs had a reasonable expectation that their medical procedures were not being video recorded.

86. Plaintiffs had a reasonable expectation that their communications with medical personnel and their medical procedures were not being viewed by Sharp security personnel or by anyone not physically present in the operating room at the time of those procedures.

1 87. Defendants, by acting as herein alleged, unlawfully recorded confidential information of
2 Plaintiffs and violated Plaintiffs' privacy rights in violation of California Penal Code §§ 632 & 637.2

3 88. Defendants did not have the consent of all parties to said conversations and
4 communications to record them.

5 89. Plaintiffs suffered harm, including but not limited to, suffering, anguish, fright, horror,
6 nervousness, grief, anxiety, worry, shock, humiliation, embarrassment, shame, mortification, hurt
7 feelings, disappointment, depression and feelings of powerlessness. Plaintiffs are entitled to treble
8 damages for such harm.

9 90. Defendants' conduct was a substantial factor in causing Plaintiffs' harm. As a result,
10 and in addition to other available remedies at law, pursuant to Penal Code section 637.2, Plaintiffs are
11 entitled to recover a sum equal to the greater of treble their actual damages or statutory penalties per
12 violation.

13 91. Plaintiffs, in accordance with Chapter 3 (commencing with Section 525) of Title 7 of
14 Part 2 of the Code of Civil Procedure, also bring an action to enjoin and restrain the Defendants from
15 any violation of this chapter by continuing to secretly video record medical procedures without the
16 consent of all parties.

17 **PRAYER FOR RELIEF**

- 18 1. For compensatory damages for the described losses with respect to each cause of action;
19 2. For general damages according to proof;
20 3. For special damages according to proof;
21 4. For statutory penalties according to proof;
22 5. For past and future emotional distress;
23 6. For punitive damages with respect to each cause of action;
24 7. For costs of this action;
25 8. For statutory attorneys' fees according to proof;
26 9. For reasonable attorneys' fees;
27 10. For pre-judgment and all other interest recoverable; and

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11. For such other additional and further relief as Plaintiffs may be entitled to in law or in equity.

Dated: March 29, 2019

GOMEZ TRIAL ATTORNEYS

By: 

John H. Gomez, Esq.
Allison C. Worden, Esq.
Ed Diab, Esq.
Kristen K. Barton, Esq.

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James R. Patterson, Esq.
Allison H. Goddard, Esq.

ADMIRE & ASSOCIATES

Duane A. Admire, Esq.

Attorneys for Plaintiffs

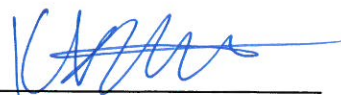
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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial on all issues.

Dated: March 29, 2019

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Attorneys for Plaintiffs